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**Proposed Lead Counsel for  
Plaintiffs and the Class**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

-----x  
CAROLYN GREENE, on behalf of herself  
and all others similarly situated,

Plaintiff,

-against-

BIOPURE CORPORATION,  
THOMAS A. MOORE, CARL W. RAUSCH,  
and RONALD F. RICHARDS,

Defendants.  
-----x

Civil Action No.03-CV-12628-NG

[Additional captions on following page]

**MOTION FOR  
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF  
AND FOR APPROVAL OF LEAD COUNSEL**

-----X  
JOHN G. ESPOSITO, on behalf of himself  
and all others similarly situated,

Plaintiff,

-against-

BIOPURE CORPORATION,  
THOMAS A. MOORE, CARL W. RAUSCH,  
and RONALD F. RICHARDS,

Defendants.  
-----X

Civil Action No.04-CV-10013-NG

-----X  
JAMES J. NIZZO, VIRGINIA C. NIZZO, and  
CARLO CILIBERTI, on behalf of themselves  
and all others similarly situated,

Plaintiff,

-against-

BIOPURE CORPORATION,  
THOMAS A. MOORE, CARL W. RAUSCH,  
and RONALD F. RICHARDS,

Defendants.  
-----X

Civil Action No.04-CV-NG

-----X  
BARRY BROOKS, on behalf of himself  
and all others similarly situated,

Plaintiff,

-against-

BIOPURE CORPORATION,  
THOMAS A. MOORE, CARL W. RAUSCH,  
and RONALD F. RICHARDS,

Defendants.  
-----X

Civil Action No.04-CV-10077-NG

-----X  
ANASTASIOS PERLEGIS, on behalf of himself  
and all others similarly situated,

Plaintiff,

-against-

BIOPURE CORPORATION,  
THOMAS A. MOORE, CARL W. RAUSCH,  
and RONALD F. RICHARDS,

Defendants.  
-----X

Civil Action No.04-CV-10078-NG

-----X  
MARTIN WEBER, on behalf of himself  
and all others similarly situated,

Plaintiff,

-against-

BIOPURE CORPORATION,  
THOMAS A. MOORE, CARL W. RAUSCH,  
and RONALD F. RICHARDS,

Defendants.  
-----X

Civil Action No.04-CV-10090-NG

-----X  
MODEL PARTNERS LIMITED, on behalf of  
themselves and all others similarly situated,

Plaintiff,

-against-

BIOPURE CORPORATION,  
THOMAS A. MOORE, CARL W. RAUSCH,  
and RONALD F. RICHARDS,

Defendants.  
-----X

Civil Action No.04-CV-10155-NG

-----x  
GREGORY KRUSZKA, on behalf of himself :  
and all others similarly situated, :

Plaintiff, :

-against- :

BIOPURE CORPORATION, :  
THOMAS A. MOORE, CARL W. RAUSCH, :  
and RONALD F. RICHARDS, :

Defendants. :  
-----x

Civil Action No.04-CV-10202-NG

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT upon the Memorandum of Law, filed herewith, plaintiffs move this Court, Honorable Nancy Gertner, United States District Judge, United States District Courthouse, One Courthouse Way, Boston, Massachusetts 02210, for an order granting plaintiffs' motion:

1. To consolidate all actions filed in the District of Massachusetts which are related to the above-captioned class action for all purposes, pursuant to Fed. R. Civ. P. 42(a); and
2. For an Order, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the "Exchange Act"), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"):

(a) appointing Selina and Alexander Chao as Lead Plaintiff for the Class of all purchasers of Biopure Corporation, securities during the period of March 17, 2003 through December 24, 2003, inclusive (the "Class Period"), and

(b) approving the selection of Pomerantz Haudek Block Grossman & Gross LLP and Wechsler Harwood LLP as Co-Lead Counsel for the Class and Perkins Smith & Cohen, LLP as Local Counsel for the Class.

Dated: March 1, 2004

Respectfully submitted,

**PERKINS SMITH & COHEN, L.L.P.**



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**Proposed Lead Counsel For the Plaintiffs and the Class**

**Attorneys for Selina and Alexander Chao**

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by ~~hand~~ (mail) on 3.1.04

on all counsel on attached  
Service list. - ses

**ATTORNEY LIST FOR BIOPURE:**

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